

FILED
02 JUN 18 AM 10:30
SUPERIOR COUNTY
CLERK
SEATTLE, WA.

The Honorable Robert S. Lasnik
CCTO JUDGE DJ
FILED ENTERED
LODGED RECEIVED
JUN 18 2002 DJ
AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY
BY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ALLAN BERMAN, individually and as
Personal Representative of the Estate of
Kathryn Hamilton,

Plaintiff,

vs

THE FRED HUTCHINSON CANCER
RESEARCH CENTER, DR. WILLIAM
BENSINGER; DR. C. DEAN BUCKNER,
DR. FREDERICK APPLEBAUM, and DR.
ROBERT DAY,

Defendants

NO. C01-0727 (R) L

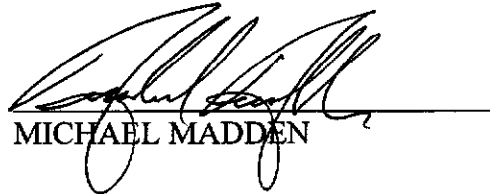
DECLARATION OF MICHAEL
MADDEN RE DEFENDANTS'
OBJECTION TO PLAINTIFF'S
SECOND REQUEST TO
SUPPLEMENT RECORD
CONCERNING STATUTE OF
LIMITATIONS SUMMARY
JUDGMENT AND REPLY TO
SUPPLEMENTAL BRIEF

1. I am one of the attorneys for the defendants in this matter and have personal knowledge of the facts stated herein.
2. The documents attached to the declaration of Thomas Dreiling, dated June 13 2002, and numbered "BIAN 00002" and "BIAN 00003" were produced to Mr. Dreiling and the undersigned by Attorney Tom Fain, representing Cell Therapeutics, Inc., in

1 response to a subpoena issued by plaintiff The documents were accompanied by a
2 letter addressed to Mr. Dreiling and me, and were received in my office on June 7th
3 at 2:27 PM Mr. Dreiling's office is located in the same building as mine
4

5 3. I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
6 STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND
7 CORRECT

8 Executed at SEATTLE, Washington, this 17th day of June, 2002.
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12 MICHAEL MADDEN
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